DOCUMENT RESUME

ED 189 326 CE 025 666

AUTHOR	Schexnayder, Deanna
TITLE	CETA: A Strategy Guide to the Comprehensive Employment and Training Act. To Be Used by Virginia Agencies for the Handicapped. Second Printing.
INSTITUTION	Virginia Association of Rehabilitation Facilities, Richmond.
SPONS AGENCY	Virginia State Governor's Office, Richmond.
PUB DATE	Nov 79
NOTE	75p.: Not available in paper copy due to colored ink. For a related document see CE 025 667.
EDRS PRICE	MF01 Plus Postage. PC Not Available from EDRS.
DESCRIPTORS	Administrator Guides: *Disabilities: *Federal Programs: Private Agencies: Program Administration: Program Descriptions: Program Development: *Program Proposals: Rehabilitation Centers: *Vocational Education: Vocational Rehabilitation
IDENTIFIERS	*Comprehensive Employment and Training Act: Virginia

ABSTRACT

Designed to serve as an introduction to the Comprehensive Employment and Training Act (CETA) for agencies serving the handicapped, this guide analyzes the CETA process and suggests ways in which CETA funds can be used to help handicapped persons achieve their vocational potential. After giving a brief history and overview of the legislation, the guide explains how the CETA organization works. The next seven sections describe eligible participants, allowable program activities, and the contents of each title included in the act. The final sections suggest ways of negotiating with prime sponsors, the contents of a proposal package, and things to look for in contract administration. The first of two appendixes lists and discusses the ten Virginia prime sponsors. The second appendix describes some CETA funded programs designed to benefit handicapped persons. (LRA)

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ED189326

CETA

A Strategy Guide to the Comprehensive Employment and Training Act
To be used by Virginia Agencies for the Handicapped

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This project was funded by the
Governor's Employment and
Training Council Contract No. 79-31 to the

VIRGINIA ASSOCIATION OF REHABILITATION FACILITIES

Second Printing
November, 1979

CE 025 666

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INTRODUCTION

CETA. Few social service professionals and, indeed, few citizens fail to recognize that acronym. For most persons, CETA is synonymous with Public Service Employment (PSE), a jobs program for the unemployed made famous by a few well-publicized scandals. However, the Comprehensive Employment and Training Act contains several programs in addition to PSE which can benefit handicapped and other disadvantaged persons.

This guide, designed as an introduction to CETA for agencies serving the handicapped, will analyze the CETA process and suggest ways in which CETA funds can be used to help handicapped persons achieve their vocational potential. After giving a brief history and overview of the legislation, the guide will explain how the CETA organization works. Sections describing eligible participants, allowable program activities, and the contents of each title will follow. The final sections will suggest ways of negotiating with prime sponsors, the contents of a proposal package, and things to look for in contract administration. Of the two appendices, one will list and discuss the ten Virginia prime sponsors while the other one will describe some CETA-funded programs designed to benefit handicapped persons.

The Virginia Association of Rehabilitation Facilities expresses its appreciation to the Governor's Employment and Training Council for funding this project under Contract #79-31. By increasing the reader's knowledge of CETA, this project strives to improve linkages between prime sponsors and private agencies serving the handicapped.

When reviewing this guide, the reader should be aware of its limitations. The guide is intended to *introduce* the reader to the possible ways handicapped persons can be served in CETA-funded programs. Therefore, much detailed information has been omitted. Agencies interested in applying for CETA funds should read the 1978 regulations and contact local prime sponsors for more detailed information. Suggestions for negotiating with a prime sponsor are based on techniques which have proven successful for other agencies in different communities. However, each agency must assess its local community to assess the validity of the suggestions.

HISTORY

Before CETA's enactment in 1973, a variety of employment and training programs existed to help the chronically unemployed. These programs were administered by several federal agencies in Washington, D.C., where it was difficult to judge individual community needs. As a result, programs often overlapped and duplicated services.

The 1973 legislation consolidated training and work experience programs for the chronically unemployed under a single agency, the Department of Labor. While the intent duplicated that of previous programs, the administration of funds shifted to a system of local block grants, based on the premise that local officials knew their community needs better than did Washington bureaucrats.

CETA's emphasis changed in 1975 when the unemployment rate rose past 7%. With the relaxation of eligibility requirements and with the expansion of public service jobs designed to put job-ready people back to work, CETA became one 'temporary' means of combating the recession. Consequently, CETA's training emphasis paled before the expanded employment activities.

When the 1977 unemployment rate surpassed 8%, President Carter increased total public service employment jobs from 310,000 to 725,000 as part of his economic stimulus package. Eligibility criteria were again tightened in an attempt to employ those persons CETA was originally designed to serve and, indeed, who were quietly being trained under other CETA titles while the PSE program roller-coastered up and down.

The rapid expansion of the public service employment program caused many side effects in local communities which affected public opinion of all CETA programs.

(1) The relaxation of eligibility requirements encouraged many agencies to create professional positions, which they later had difficulty re-filling when eligibility criteria were tightened.

(2) Due to limited or non-existent planning time to handle the rapid increase in PSE positions, dead-end jobs were created; some officials hired relatives, and other favored constituents. Both of these practices eventually caused the widespread negative publicity endured by CETA.

(3) Finally, and perhaps most seriously, the PSE situation forced CETA prime sponsors to allocate their administrative resources

in that direction. Because the administrative energy needed to establish procedures for a new program was deflected, some program operators struggled for years without clear-cut operational procedures.

When Congress re-enacted CETA in 1978, it listened closely to the criticisms and problems encountered during CETA's first five years of operation. As a result, the new regulations reflect an increased emphasis on the original client CETA was designed to serve - the economically disadvantaged, structurally unemployed client. Certain target groups receive greater emphasis, including the handicapped. Public service employment will be reduced for the 'cyclically' unemployed but maintained for the 'structurally' unemployed. In response to the severe problem of youth unemployment, programs designed to meet their special needs have been retained.

One new element of CETA, the Private Sector Initiative Program, is intended to address the employment needs of the private sector, an area largely ignored by the original legislation. And, lastly, the local autonomy and flexibility found in the original legislation has been reduced.

CETA's history in Virginia has paralleled that of the rest of the United States, with two notable differences. First, less scandals have taken place in Virginia than in other parts of the country. And, second, the Governor's Employment and Training Council, which coordinates the activities of Virginia's prime sponsors, began as a strong task force and has continued its emphasis on planning for proper use of CETA funds.

So what lies in the future of CETA? Agencies serving the handicapped should be optimistic. The new legislation is effective through September 30, 1982. Under the new regulations, most handicapped persons are eligible for any CETA program. Increased emphasis will be placed on proper program administration, and local prime sponsors are required to involve community-based organizations in planning CETA programs. For those agencies who have struggled with CETA for the past five years, the future should be easier as CETA officials increase their commitment to the handicapped. For agencies just beginning to understand CETA, at least the rules, though complicated, have a better chance of being consistent.

A LEGISLATIVE OVERVIEW

The Comprehensive Employment and Training Act Amendments of 1978 reorganized the basic content of each title. To assist the reader in locating the titles which apply to his program, a summary of each title is provided.

Title I - Administrative Provisions

This title outlines general organizational and administrative provisions under the Act applicable to all programs and special conditions applicable to public service employment. All programs are authorized through 1982 except for three youth programs (Part A of Title IV) and the private sector initiatives program (Title VII), which are only authorized through FY80.

Title II - Comprehensive Employment And Training Services

This title (Title I in the original legislation) establishes programs to aid the economically disadvantaged in entering or re-entering the job market.

Part A defines financial assistance available to states to perform activities under this title. It also provides funds for the operation of state employment and training councils, educational linkages and special services grants, and needed vocational education services.

Part B provides services for the economically disadvantaged, which may include classroom and on-the-job training, education, counseling, work experience, and other supportive services designed to ease the client's transition into competitive employment.

Part C a little-used CETA section, serves persons employed at less than their full skill potential through occupational upgrading and retraining efforts.

Part D prepares the structurally unemployed for unsubsidized employment through public service employment.

Title III - Special Federal Responsibilities

All Title III programs, which serve persons having particular disadvantages in the labor market, are administered at the federal level. Specific target groups include the handicapped, native Americans, veterans, and older workers, among others.

Title IV - Youth Programs

Several different programs geared towards persons less 21 years old are grouped under this title. They are:

(A) the youth employment demonstration programs, comprised of youth incentive entitlement pilot projects, youth community conservation and improvement projects, and youth employment and training programs;

(B) youth job corps; and

(C) the summer youth program.

Title V - National Commission For Employment Policy

The commission established under this title is responsible for 'examining broad issues of development, coordination, and administration of employment and training programs, and for advising the President and the Congress on national employment and training issues.'

Title VI - Countercyclical Public Service Employment Programs

Public service jobs are created under this title to provide temporary employment during periods of high unemployment. This program becomes effective when the national unemployment rate is greater than 4% and expands proportionally until the unemployment rate reaches 7%. It grows at a faster rate if unemployment exceeds 7%.

Title VII - Private Sector Opportunities For The Economically Disadvantaged

This title authorizes a private sector initiative program to demonstrate the effectiveness of involving the business community in CETA employment and training activities.

Title VIII - Young Adult Conservation Corps

This program, administered through agreements with the Departments of Agriculture and of the Interior, provides employment and experience to out-of-school persons, ages 16-23. The corps performs conservation and other projects on Federal or non-Federal public lands or waters.

Of the CETA Titles outlined above, funding for program operation under Titles II, IV, VI, and VII is distributed to prime sponsors (CETA administrative jurisdictions) in each state. Because most persons using this guide will work only with local prime sponsors, no further mention will be made about Titles V and VIII. Title III will be discussed due to its special emphasis on programs for handicapped persons.

The new legislation requires most CETA participants to be economically disadvantaged and unemployed, underemployed, or in school. Because CETA's definition of economically disadvantaged includes all handicapped individuals, CETA has become a very attractive source of revenue for vocational programs serving the handicapped.

THE CETA ORGANIZATION

Prime Sponsor Definition

In order to effectively negotiate for funds under one of the CETA titles, some knowledge of CETA's operation is helpful. This section will explain the distribution of funds to the local level by the Department of Labor and the local CETA administrative responsibilities.

Federal CETA funds are allocated to the fifty states based on population and the unemployment rates of each state. Within each state, local 'prime sponsors' receive block grants from the Department of Labor. This money is either used directly by prime sponsors or contracted to sub-grantees to provide needed employment and training services to CETA participants.

To be eligible as a 'prime sponsor' or administrator of all CETA funds designated for a local area, a unit of local government (a city or county) must have a population of at least 100,000. Cities or counties may also form consortia as long as one of the jurisdictions has a population greater than 100,000. The governor administers CETA funds for all localities which are not included in any other prime sponsor area, under the Balance-of-State prime sponsor.

In Virginia, there are 10 prime sponsors. (See Appendix A for information about individual prime sponsors.) Most local prime sponsors are administered by a department of the local government and are directly linked to City Councils or Boards of Supervisors. The Balance-Of-State prime sponsor is administered by the CETA Division of the Virginia Employment Commission.

In addition to individual prime sponsors, the governor of each state appoints a Governor's Employment and Training Council (GETC). This council reviews the operations and plans of local prime sponsors and consults with the State Advisory Council on Vocational Education concerning employment and training needs of eligible participants.

As the administrator of CETA funds, each prime sponsor must develop a comprehensive employment and training plan which outlines services to be provided to eligible participants in that jurisdiction. This plan, which consists of a master plan and an annual plan, must be approved by the regional administrator of the Department of Labor before funds can be obtained. The plan will be described more fully later in this section.

Staff Responsibilities

Each prime sponsor administrator hires a professional staff to perform certain functions. Although organizational structures vary among prime sponsors, certain responsibilities are common to all of them. These are:

(1) Preparation of the master and annual plans;

(2) Professional, technical and clerical assistance to the planning council;

(3) Development of procedures for program planning, operation, assessment, and fiscal management; and

(4) Program evaluation and determination of a need to re-allocate resources.

Seven of Virginia's prime sponsors contract all programs to public and private agencies and, therefore, have established mechanisms for working with contractors and sub-contractors. Two administer some programs directly and contract for other programs. The remaining prime sponsor operates its own CETA programs. Consequently, a part of these organizations is designed to serve clients directly.

Planning Council

In developing its CETA plan, each prime sponsor must consult with its planning council. The planning council, appointed by the prime sponsors, consists of 'representatives of the eligible population, organized labor, community-based organizations, the employment service, veterans organizations, representatives of handicapped individuals, vocational education agencies, public assistance agencies, other education and training agencies and institutions, business, labor, and, where appropriate, agricultural employees and workers.' This council must meet at least five times a year and its meetings must be announced and open to the public.

Although the council's role is advisory, it can be very influential in development of the prime sponsor's plan. A strong planning council represents the community in which CETA must operate its programs. Therefore, if the planning council identifies unmet community needs or unnecessary duplication of services, the prime sponsor, which is responsible to local elected officials, usually takes these recommendations seriously.

In addition to participating in the development of the prime sponsor's plan, the planning council also: (1) submits recommendations on the final plan, (2) monitors and provides for evaluation of programs, and (3) provides for a continuing needs assessment for CETA programs.

The Comprehensive Employment And Training Plan

Under the CETA legislation, each prime sponsor must submit an employment and training plan to the Department of Labor. This plan is designed to assure that CETA services are reaching the appropriate population groups and that various organizations are involved in the plan's preparation. *Because all training services to be provided to participants must be included in the plan, any agency interested in operating a CETA program should be aware of the composition of the local CETA plan.*

As mentioned earlier, each plan consists of a master plan and an annual plan. The master plan serves as the 'long-term charter' under which the prime sponsor operates CETA programs. The annual plan, which must be submitted every year, specifically outlines how activities and services will be provided to eligible CETA participants.

For persons interested in learning how the local prime sponsor operates, a review of the comprehensive employment and training plan is a good way to begin acquiring information. The plans are public information and may be reviewed by any person for at least 30 days before they are submitted to the regional administrator.

Contents of the master plan. The master plan must include the following information:

(1) A description of activities ensuring that individuals most in need, including the handicapped, are receiving CETA services;

(2) Methods used for establishing service priorities;

(3) A description of how services will be provided;

(4) Procedures and criteria used to select service providers;

(5) A description of how special consideration will be given to community-based organizations operating programs of demonstrated effectiveness;

(6) Methods of coordinating programs with other federal, state, local, and private agencies;

(7) A description of the planning council's organization and operation;

(8) A description of the prime sponsor's administration and operation;

(9) A description of affirmative action and non-discrimination services; and

(10) A description of efforts to remove architectural employment barriers for the handicapped.

Contents of the annual plan. The annual plan allows the Department of Labor, community groups, and interested citizens to evaluate CETA's programs by including the following information:

(1) A description of the eligible population by age, race, sex, and national origin and a listing of the proposed services to be provided to significant segments of the eligible population;

(2) A description of specific services to individuals who have severe disadvantages in obtaining employment, including the handicapped;

(3) Performance and placement goals for combined programs; and

(4) A summary of results from the previous year, including a section on how the special needs of the handicapped have been met.

THE CETA PARTICIPANT

CETA programs are supposed to help overcome employment barriers for disadvantaged individuals. To ensure that these persons are being served by CETA, certain participant eligibility requirements have been established for programs under each title. Table 1 outlines the requirements for each title.

Due to a revision of the definitions of the terms 'economically disadvantaged' and 'unemployed', most handicapped clients served by community programs should be eligible for CETA services. For the reader's convenience, these definitions have been copied from the CETA regulations.

Economically disadvantaged - means a person who is either:

(a) A member of a family which receives public assistance;

(b) A member of a family whose income during the previous six months on an annualized basis was such that

  (1) The family would have qualified for public assistance, if it had applied for such assistance; or
  (2) It does not exceed the poverty level; or
  (3) It does not exceed 70 percent of the lower living standard income level;

(c) A foster child on whose behalf state or local government payments are made;

(d) *Where such status presents significant barriers to employment,*

  (1) A client of a sheltered workshop;
  (2) A handicapped individual;
  (3) A person residing in an institution or facility providing 24-hour support such as a prison, a hospital or community care facility; or
  (4) A regular outpatient of a mental hospital, rehabilitation facility or similar institution.

Unemployed person - means for purposes of determining eligibility:

(a) A person who is without a job for at least seven consecutive days prior to application for participation. A person shall be considered as being without a job if, for seven consecutive days, such person:

  (1) Worked no more than 10 hours; and
  (2) Earned no more than $30; and
  (3) Was seeking and available for work; or

Table 1

Participant Eligibility Requirements For CETA Programs

Title II-B, VII, and Governor's Grants

- Economically disadvantaged
- Unemployed, underemployed, or in school

Title II-C

Upgrading Programs

- Operating at less than full skill potential
- No advancement in last six months with same employer
- Employed in entry level, unskilled, or semi-skilled position or position with little or no opportunities for advancement

Retraining Programs

- Notice of impending lay-off
- Little opportunity for re-employment in equivalent occupation

Title II-D

- Economically disadvantaged
- Unemployed at time of application and 15 of the last 20 weeks
- or • Member of family receiving public assistance
- Residence in prime sponsor's jurisdiction (in most cases)

Title IV

YETP

- Unemployed; underemployed or in-school
- 16-21 years old (14 and 15 year olds may participate under extraordinary circumstances)
- Family income less than 85 percent of lower living standard income level

YCCIP

- Unemployed
- 16-19 years old

SETP

- Economically disadvantaged
- 14-21 years old

Title VI

- Unemployed at time of application and 10 of the last 12 weeks
- Family income less than 100 percent of lower living standard income level

(b) A person who is:

(1) A client of a sheltered workshop;
(2) Institutionalized in a hospital, prison, or similar institution; or

(c) A person who is 18 years of age or older and whose family receives public assistance or whose family would be eligible to receive public assistance but for the fact that both parents are in the home; or

(d) A person who is a veteran who has not obtained permanent unsubsidized employment since being released from active duty. Such person shall be considered to meet 'unemployed' eligibility requirements regardless of the specific term of unemployment required.

Handicapped individual - means any person who has a physical or mental disability which constitutes a substantial barrier to employment and can benefit from CETA services provided, as determined by the prime sponsor.

In addition to eligibility requirements, certain programs identify client target groups which have had particular disadvantages in the labor market and should be given priority in receiving services. Examples of such target groups include handicapped individuals, displaced homemakers, older persons, youth, single parents, offenders, public assistance participants, disabled or Vietnam veterans, and persons lacking basic language skills.

To avoid the same persons being served for indefinite periods of time, limits exist for participation in CETA programs. No one may participate in CETA programs for more than 30 months in a five-year period. Specific limits for each program will be included in the information for that activity.

ALLOWABLE CETA PROGRAM ACTIVITIES

Each CETA title emphasizes a different group of persons to be served and a different combination of allowable activities. Because certain activities may occur under several titles, each will be discussed here to avoid duplication later. Agencies interested in operating CETA programs should supplement the information in this section by reviewing the 1978 CETA regulations.

Classroom training is training conducted in an institutional setting which provides participants with the technical skills to perform a certain job or enhances employability by upgrading basic skills needed to enter the job market.

Allowances may be paid to persons in classroom training for up to 52 weeks in a five-year period.

On-the-job training (OJT) is training given to a participant after he is hired by a public or private employer and while he is performing tasks necessary to successfully hold his job. Employers are reimbursed for extraordinary training and services costs.

Work experience is a short-term work assignment with a public or non-profit agency which enables a participant to develop good work habits and basic work skills. Designed for persons who have never worked or who have not worked for a long period of time, the program pays the participant's salary, which must be greater than or equal to the minimum wage.

In Title II work experience programs, participation is limited to 1,000 hours in a one-year period and 2,000 hours in any five-year period. Certain Title IV programs allow longer participation.

Public service employment (PSE) is subsidized employment with public or private, non-profit employers. Such jobs should not replace existing positions but should enhance or expand current agency services.

Although prime sponsors may establish more restrictive guidelines, participation must not exceed 78 weeks in a five-year period.

Services to CETA participants, which may be provided to clients in any of the programs mentioned above, fall into four categories:

Services to applicants include outreach and intake. While outreach is usually a shared responsibility between prime sponsors and program operators, most prime sponsors handle intake activities themselves.

Employment and training services include orientation to the world of work, counseling, employability assessment, job development, job search assistance, job referral and placement, eligibility determination for the Targeted Jobs Tax Credit program, and a vocational exploration program (for youth only).

Supportive services include health care and medical services, child care, transportation, temporary shelter, assistance in securing bonds, family planning services, legal services, and financial counseling and assistance.

Post-termination services include employment and training services and supportive services listed above and may be provided for 30 days after termination from a CETA program to enable CETA participants to retain employment.

Other activities not mentioned above may be used if they help participants meet program goals. Examples of such activities include removal of artificial barriers to employment, job restructuring, establishment of merit systems, and development of affirmative action plans.

In any contract, any of the above activities may be combined to best fit the needs of the clients being served. Emphasis on linkages among CETA activities in the new regulations will probably result in more encouragement from prime sponsors to combine activities than has previously existed.

TITLE II

Title II, which authorizes programs for the economically disadvantaged, is the most flexible portion of the Comprehensive Employment and Training Act. In addition to support for the activities listed in the previous section, this title authorizes the operation of the state employment and training council, the prime sponsor council, vocational education assistance, and special grants from the governor.

The title is divided into four parts and is usually referred to by identifying the appropriate part authorizing a particular activity. For example, PSE jobs under this title would be referred to as 'Title II-D PSE'. Each of the four parts will be described below.

Part A - Financial Assistance Provisions

This part outlines how Title II A, B, and C funds will be allocated among states and prime sponsors. Although exact amounts differ from year to year, funds are always distributed based on the past year's funding level for training programs, the number of unemployed persons in each region, and the number of low-income adults in each region.

Most of these funds - 85% - go directly to prime sponsors. The state employment and training council (in Virginia, the Governor's Employment and Training Council) distributes the other 15% for activities specified in this part and described below.

Supplemental vocational education assistance (6% of total funds). This money provides vocational education and services to CETA participants in each prime sponsor's jurisdiction. Prime sponsors sign non-financial agreements with the Vocational Education Board, specifying how these funds will be used.

Governor's Employment and Training Council (GETC) (1% of total funds). Formerly called the Governor's Manpower Services Council (GMSC), this body serves in an advisory capacity to the state in deciding how CETA funds shall be used in Virginia. The Governor appoints council members, including representatives of community-based organizations and the handicapped.

Coordination and special services grants (4% of total funds). The GETC funds projects which improve coordination between CETA programs and other government-funded employment and training programs, minimize duplication of services, or provide technical assistance

to prime sponsors. Special model training and employment programs are also supported by these funds.

Educational linkages grants (1% of total funds). The GETC also contracts with agencies to establish linkages between prime sponsors and educational agencies and other agencies providing training programs.

Part B - Services For The Economically Disadvantaged

Title II-B funds all allowable activities except PSE for persons who are economically disadvantaged and 16 years of age or older. Because so many handicapped persons are included in CETA's definition of economically disadvantaged, this title is an excellent potential source of funds to provide training, services, work experience, OJT, or any combination thereof to handicapped clients.

One problem which may be encountered by persons wanting to use these funds is that traditionally such funds have been used to serve other groups than handicapped. Two approaches may be taken to overcome such an obstacle:

(1) Serve other disadvantaged persons in the program in addition to handicapped persons, or

(2) Educate the prime sponsor as to the new definition of 'economically disadvantaged' and make the staff and the planning council aware that handicapped persons are not adequately being served by existing CETA programs.

Possible rehabilitation programs eligible for funding under this title are vocational evaluation, work adjustment, job readiness, and job placement programs. Skill training programs and projects with industry could also be operated with II-B funds. Table 2 compares rehabilitation and CETA terminology. In Virginia, the Balance-of-State prime sponsor has taken the lead in recognizing that certain handicapped groups have special training needs which are best served by programs designed especially for these groups. Consequently, a number of rehabilitation facilities run CETA programs which serve primarily handicapped persons. (See Appendix B for details.)

When writing proposals, it is important to use terms the funding agency understands. For those readers who define their programs in rehabilitation terminology, comparable CETA words are listed in Table 2.

Table 2

A Comparison Of Rehabilitation And CETA Terminology

REHABILITATION TERMINOLOGY	CETA TERMINOLOGY
Outreach, intake	Recruitment, outreach, intake
Vocational evaluation	Employability assessment
Work adjustment	Orientation to the world of work, counseling; also work experience (optional)
Job readiness training	Job search assistance
Job placement	Job development, job referral and placement
Skill training	Classroom training, OJT

Part C - Upgrading And Retraining Programs

Upgrading and retraining programs are designed to assist persons who are already employed, but are trapped at a certain job level with no promotional opportunities or are in danger of becoming unemployed because their jobs become obsolete or non-existent in a particular labor market.

Title II-C authorizes classroom training, on-the-job training, employment and training services, and supportive services to alleviate these problems.

To be approved for an upgrading program, positions for which participants are being upgraded must not be available to entry-level employees, must provide opportunities for highly skilled work or further upward mobility, and must not have adequately trained personnel already available within the organization.

Retraining programs must teach new skills to participants for occupations in which skill shortages exist and get a commitment from an employer to hire a person being trained into the position for which he is being trained.

Thus far in Virginia, little use has been made of this title. However, agencies knowing former clients who could benefit from

such services should notify the prime sponsor that such a need exists in its jurisdiction.

Part D - Public Service Employment For The Economically Disadvantaged

Many community agencies are familiar with Public Service Employment (PSE) because of the heavy emphasis placed on this program during the country's high unemployment rate in the last few years. Those agencies who used PSE to hire professional staff have probably also had a less qualified pool of job applicants during the past year, causing them to give up the staff positions and feel that PSE is a waste of time.

Public service jobs, authorized under both Titles II and VI, are a necessary part of a comprehensive employment and training program. Persons completing the training and services described in this guide often need a period of employment to fine-tune the skills learned in training and to provide employers with evidence of experience that is so critical when competing in the job market. Because the purposes of PSE under Titles II and VI differ, each program will be described separately. Table 3 will then compare the two programs.

Designed for the 'structurally unemployed', Title II-D PSE programs serve those economically disadvantaged persons who lack the necessary skills or employment experience to successfully compete in the labor market. CETA pays the participant's wages for up to 18 months but requires that a certain percentage of the money given to a public or private agency be used for training and services to improve the participant's future employability.

Jobs are allocated to public agencies within a prime sponsor's jurisdiction to provide needed public services. However, because the average salary cannot exceed $7,200 per year and no salary can be greater than $10,000, public agencies often cannot use the available number of positions and solicit private, non-profit agencies to hire PSE participants. Jobs cannot be used to replace existing positions but must be newly created jobs which increase or improve existing public services.

In light of the wage restrictions and the reduced pool of job applicants, agencies interested in using PSE funds should create jobs which may be performed by eligible participants. Instead of hiring more professional staff, some agencies have analyzed their current organizational structures and re-designed jobs to relieve professional staff of clerical and para-professional duties. PSE employees have taken over these functions, which both improves the utilization of professional staff and gives the PSE employee an opportunity to learn the basics of a new profession. Such positions are particularly well-suited for certain handicapped persons.

TITLE III

Title III programs differ from the others discussed in this guide because they are administered from the federal level. Defined as 'special federal responsibilities', these programs serve the employment-related needs of persons who suffer particular disadvantages in the labor market and encourage research, training, and evaluation activities of a regional or national scope.

Special Programs

In addition to special programs for the handicapped, Title III authorizes employment and training programs for native Americans, migrant and seasonal farmworkers, middle-aged and older workers, displaced homemakers, and offenders. Job search and relocation assistance and partnerships agreements between prime sponsors and employment security agencies are also sponsored by these funds. Discussion of these programs is beyond the scope of this publication; details can be obtained from the CETA legislation.

In selecting programs designed to serve handicapped individuals' employment and training needs, the Department of Labor seeks proposals that:

(1) are most appropriately administered at the national level, such as programs occurring in more than one state;

(2) establish or expand linkages between employment and training agencies and the private sector;

(3) continue to support programs which have demonstrated their effectiveness;

(4) reduce skill shortages in certain occupations; and

(5) serve unemployed persons who suffer due to massive layoffs, plant closings, or natural disasters.

The programs for handicapped persons should be designed to assist the implementation of the Education for the Handicapped Act and Section 504 of the Rehabilitation Act of 1973 by providing special services and removing artificial barriers, as required by

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*The regulations for Title III programs were not yet published when this guide was being written. Thus, information for this section is taken directly from the CETA legislation.

those peices of legislation. Training programs for personnel who work with and assist handicapped persons are also authorized.

Research, Training and Evaluation

The second part of Title III legislation establishes experimental programs to test different means of solving employment and training problems. Such projects include programs designed to eliminate artificial barriers to employment and to test the usefulness of sheltered employment for those difficult to employ, among others.

Other activities authorized under Title III include the development of a comprehensive system of labor market information, evaluation of Title II programs, and stimulation of local private economic development.

TITLE IV

In response to the particular employment difficulties faced by youth, Congress enacted three new youth employment and training programs in 1977. The 1978 CETA consolidated these and other youth programs under Title IV of the Act. Title IV is divided into three parts. Part A encompasses youth employment demonstration programs, usually in the form of youth employment and training programs (YETP). Part B establishes a job corps for economically disadvantaged youth, while Part C continues the summer youth program.

Youth Employment Demonstration Programs

Funds for the Youth Employment and Training Programs (YETP) go directly to prime sponsors to establish programs which combat the structural unemployment problems of youth.

In addition to the allowable activities outlined in a previous chapter, YETP authorizes vocational exploration programs in the public and private sector, job restructuring, and programs which overcome sex stereotyping. The purpose of such programs is to enhance the job prospects of unemployed, underemployed, or in-school youths, ages 16-21. Family income of such youth must not exceed 85% of the lower living standard income level.

This section of the legislation also authorizes youth incentive entitlement pilot projects (YIEPP), highly experimental programs which test the feasibility of coupling part-time employment and training with school work for economically disadvantaged youth who return to school. Funds for such programs are quite limited.

The third type of program outlined in Part A of Title IV is the Youth Community Conservation and Improvement Project (YCCIP). With funds allocated to the states and then applied for by individual prime sponsors; these projects provide employment, work experience, skill training, and opportunities for community service for eligible youth, ages 16-19. Community based organizations should assist in the development of such projects.

The regulations for Title IV programs were not yet published when this guide was being written. Thus, information for this section is taken directly from the CETA legislation.

Prime sponsors which operate YETP and YCCIP programs must establish youth planning councils to provide advice on program goals, policies, and procedures.

Summer Youth Programs

Part C of Title IV authorizes prime sponsors to establish summer employment and training programs for disadvantaged youth. These may be employment programs, a combination of classroom and on-the-job training activities, or vocational exploration projects.

Planning for summer youth programs involves both the prime sponsor planning council and the youth council. Agencies interested in operating such a program should contact the appropriate prime sponsor for details.

TITLE VI

Public service employment under Title VI serves a different function from Title II PSE. Created during the high employment period of the mid-1970's, Title VI provides temporary employment when the national unemployment rate exceeds 4%. Because the number of available PSE jobs fluctuates with the unemployment rate and the participants are probably better trained than Title II participants, this program is considered a 'countercyclical' employment program.

Half of the Title VI funds given to a prime sponsor must be used for special projects. Funds for at least one-third of these projects, usually limited to 18 months in duration, must be awarded to non-profit organizations. Examples of projects include city beautification and weatherization of homes for the elderly and the disadvantaged.

The rest of Title VI may be used to fund entry-level positions in public agencies and their subdivisions. As with Title II, these agencies may allocate positions to private, non-profit agencies which perform public services. Participants in these positions receive services to enable them to find unsubsidized employment.

Individual participation in any PSE position is limited to 18 months, and wages are subject to the same restrictions as Title II, with one exception. In geographical areas where high wages prevail, Title VI PSE wages may be supplemented from other sources as long as the total wage supplements do not exceed 10% of a prime sponsor's Title VI allocation.

Table 3

A Comparison Of Title II And Title VI PSE

	Title II	Title VI
Purpose	Service to 'structurally' unemployed	To combat 'cyclical' unemployment
Conditions for authorization of funds	Unemployment rate	Unemployment rate
Eligible participants	Economically disadvantaged	Income less than 100% of lower living standard income
Types of jobs	100% entry level jobs, either regular or project	50% projects; 50% entry level positions
Training component	Greater than or equal to 15% for FY80 Greater than or equal to 20% for FY81 Greater than or equal to 22% for FY82	
Training and services component	Remainder	Greater than 5% for FY80-82
Administrative component	Less than or equal to 10% of total funds	Less than or equal to 15% of total funds
Wages and fringes	Remainder	Greater than or equal to 80%
Length of participation	18 months	18 months
Salary range (paid by CETA)	Minimimum wage - $10,000	Minimum wage - $10,000
Average salary	$7,200	$7,200
Wage supplementation from other sources	No	Up to 10% of total funds

TITLE VII

Title VII of CETA, also known as the Private Sector Initiative Program, is a demonstration program added to the CETA system in the 1978 amendments to the Act. Designed to involve the business sector in the planning and operation of CETA activities for the economically disadvantaged, it provides for the establishment of Private Industry Councils (PICs) in each prime sponsor region. Two or more prime sponsors may jointly form a PIC.

PIC Role And Structure

Each PIC must be composed of business and industry members, who make up at least half of the council. Other required representatives include organized labor, community-based organizations, and educational agencies and institutions. Each PIC chairman serves as an ex-officio, non-voting member of his prime sponsor's planning council; each planning council chairman holds a similar position with the appropriate PIC.

The PIC role, as defined in the regulations, emcompasses general, planning, and operational functions. Among the general duties are to serve as an intermediary between the local business community and the CETA structure, to represent the private sector in making employment and training programs more responsive to local employers' needs, and to suggest ways to increase private sector job placements for CETA participants.

In planning activities to be performed under this title, the PIC should analyze private sector job opportunities, develop specific private sector employment and training projects, develop criteria for occupations for which participants are to be trained, and ensure coordination with similar programs funded by other federal agencies.

Operationally, the PIC has great latitude in deciding how programs are to be administered under this title. It may administer its own programs, incorporate a body to operate them, or sub-contract program operations to existing private firms and established employment and training agencies.

At the time of this publication, most PICs in Virginia are still in the developmental stages. Therefore, it is difficult to predict exactly which form they will take. Agencies serving the handicapped should keep informed through the representatives for community-based organizations or other members of the local PIC.

Allowable Activities

All of the activities allowed under Title II are also permitted under Title VII except PSE. A number of additional activities may be conducted, including:

(1) Coordination of training and employment so that a participant may attend school and work for a private employer at the same time;

(2) Development of a small business intern program;

(3) Coordination of Title VII programs with other job development and placement activities conducted by public and private agencies;

(4) Follow-up services to participants hired by private employers;

(5) Development of job skill requirement forecasts by area employers and the sharing of such information with prime sponsors;

(6) Development of apprenticeship programs;

(7) Technical assistance to private employers to reduce the administrative burden of employment and training programs; and

(8) Other activities which demonstrate how to train and employ economically disadvantaged persons in the private sector.

NEGOTIATING WITH A PRIME SPONSOR

The CETA regulations allow and encourage the use of CETA funds to support programs for the handicapped. However, most agencies serving handicapped clients will find that simply knowing the regulations is not sufficient to get a program funded. As an agency interested in applying for CETA funds, you must also know your local community, your clients' needs, and the way CETA operates in your community. This section will suggest activities and strategies to be used in negotiating with prime sponsors. Decide which are applicable to your community before planning your negotiating strategy.

(1) Understand your prime sponsor's operation.

Because each prime sponsor organizes itself differently, find out whether your local prime sponsor operates its own CETA programs or contracts with existing community agencies. Agencies serving clients in more than one prime sponsor region need to find out how each prime sponsor operates.

There is other important information to obtain about your prime sponsor, including the procedures and timetables of its planning cycle (see Table 4), staff functions, and the decision-making process.

(2) Determine possible ways of working with prime sponsors.

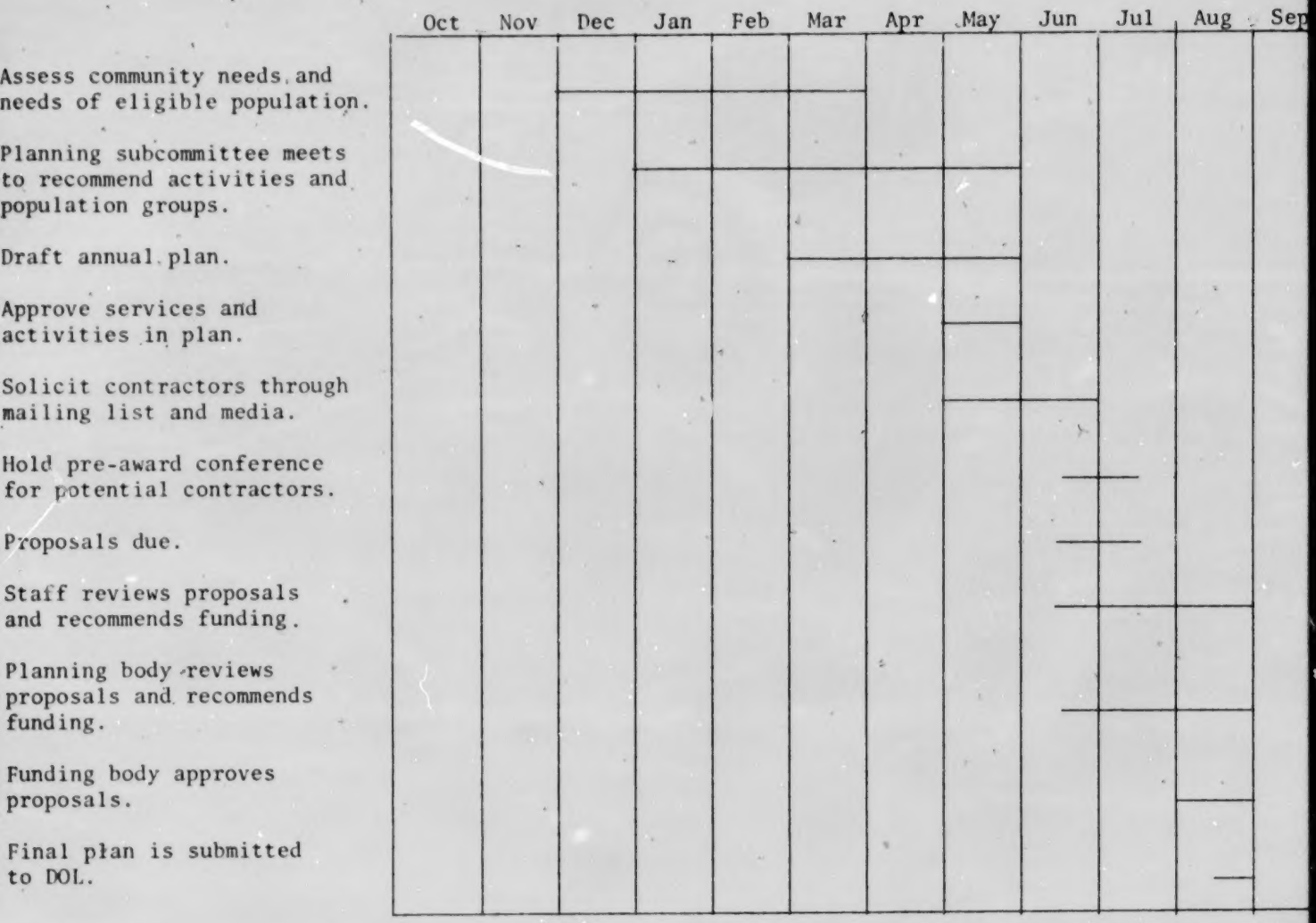
Getting this information will help you ascertain the possible means of negotiating with a prime sponsor and plan strategies for those negotiations. For example, it would obviously be impossible to contract for the operation of a CETA program if the prime sponsor operates all of the programs itself. The following paragraphs will discuss some different ways to participate in the CETA process.

If your prime sponsor operates its own programs, you could:

- Refer your clients to CETA-run programs to take advantage of the skill training, OJT, and PSE opportunities.
- Apply for participation as a work experience work site. This means that CETA clients (including your clients who have been certified as CETA-eligible) could be referred to your agency for up to six months to learn

Table 4

The Prime Sponsor Planning And Funding Cycle



*Prime sponsors do not follow all of the steps outlined above. Contact local prime sponsor for specific dates and activities that apply.

proper work habits. Your agency could be reimbursed for the cost of supervision and client wages, but not for counseling or other services.

- Get on the list of approved vendors for CETA's individual referral program. Agencies offering skill training in an occupation listed in the CETA plan may be eligible to receive individual referrals.

- Apply for PSE positions outstationed in the community to public and private, non-profit organizations.

If your prime sponsor contracts with public and private agencies to provide CETA services, your possibilities are more extensive. In addition to the approaches outlined in the last paragraph, your agency could:

- Contract with your prime sponsor to operate one or more CETA programs. This section and the following sections on proposal preparation and contract administration will explain how to accomplish this.

- Sub-contract with another CETA contractor to provide a portion of the services that contractor has agreed to perform. This approach may be appropriate when a CETA contractor is having difficulty in adequately serving handicapped persons under its contract, when an agency is too small to exert the needed effort to administer a CETA contract, or when several agencies agree to divide service geographically, with one agency responsible for contract administration.

(3) Review the prime sponsor's current plan. A copy should be available in each prime sponsor's office. When reading the plan, identify the services and programs currently available to handicapped persons. Then monitor these programs to see if they are really accomplishing their stated objectives. If they are not, you may want to submit a competing or supplemental proposal for the next fiscal year.

(4) Meet with other agencies serving handicapped persons in your community to assess the employment and training needs of these agencies' clients. Determine whether the current programs meet these needs. If not, formulate ideas for programs to serve these unmet needs in a position paper to the prime sponsor. Be sure to include your CETA Planning Council's handicapped representative in these discussions.

In identifying client needs that are not being met by existing programs, be sure to differentiate among the needs of and services available to persons with different types of handicaps. Persons not familiar with rehabilitation programs for the handicapped often associate the word 'handicapped' with the physically handicapped and may overlook the different needs of the mentally retarded or emotionally handicapped client. Determine whether programs for each client group should be part of programs for other CETA clients or separate programs serving only the identified client groups. Explain your reasoning in the position paper.

(5) Educate the CETA prime sponsor's planning staff and planning council about the special needs of handicapped persons through presentations and individual meetings. Although the position paper described in #4 may provide a good starting point, personal contact is essential so you can answer the prime sponsor's questions.

Be prepared to answer questions about services already being provided to CETA-eligible handicapped clients by the Department of Rehabilitative Services and the Department of Mental Health and Mental Retardation. Differentiate among the types of clients served by each agency, if appropriate. If CETA funds would be used to expand the number of persons served, say so. DRS and DMH-MR can usually provide you with statistics outlining how many clients need their services, the amount of money available from their agencies to provide these services, and the additional funds needed to serve the remaining clients.

Identify CETA's responsibilities to handicapped persons under Section 503 and 504 of the Rehabilitation Act. As a program of a federal agency, CETA must adopt affirmative action plans to serve the handicapped. The new regulations clearly allow and encourage CETA to serve more handicapped persons. Inform CETA prime sponsors of this responsibility.

(6) Attend planning council meetings to increase your knowledge of current issues being discussed. From these meetings, you can find out how much money will be available under different titles, the different stages in the planning cycle, and the activities of prime sponsors, program operators, and PICs.

(7) Try to get appointed to the CETA planning council as a representative of the handicapped or a community based organization. Because selection techniques vary, you may want to

talk to current members of the planning council to ascertain how they were selected.

If you cannot get a representative appointed to the planning council, establish ties with representatives of the handicapped and community-based organizations (CBOs). Because these persons represent your interests, they should encourage programs which would benefit your clients.

(8) Invite CETA prime sponsor staff to visit your agency and show them what you are already doing to meet the employment and training needs of other handicapped persons. Most contracts are awarded based on previous experience in running employment and training programs. Therefore, you should convince CETA officials that your agency has the experience and administrative capability to operate a CETA program.

When meeting with CETA officials, find out if your proposal fits CETA's goals. Be sure to define the service in CETA's terminology and candidly discuss expected outcomes.

(9) Enlist community support for the proposed service. Get letters of support from the agencies who helped develop the position paper, elected officials, employers, and other influential persons.

(10) Find out the schedule for drafting the CETA plan and participate in the CETA planning process. Under law, CETA is required to include community based organizations in its planning process. Take advantage of your opportunity to comment on the plan and use your community contacts to see that the needed services for handicapped persons are included in the final plan.

(11) Give your agency's name to the prime sponsor so that you will receive a 'Request for Proposal' (RFP) package. When you receive the package, decide which title of funds you are interested in and whether you want to apply for funding directly or wish to sub-contract for a portion of another agency's contract. Critically assess your management and financial systems to help determine your ability to administer a contract.

(12) Prepare the RFP. In preparing your proposal, you will need to specify the number and types of persons to be served,

describe the program in a narrative section, predict program outcomes, and prepare a project budget. When designing your program, you may wish to consider serving other CETA-eligible clients besides the handicapped.

Be sure to follow instructions carefully when preparing the package and submit your proposal on time. Most prime sponsors offer technical assistance to agencies with RFP preparation.

(13) If your proposal was not funded, find out why and make the necessary changes. Then re-submit the proposal to the prime sponsor with a letter requesting approval should funding become available later in the year.

THE APPLICATION PROCESS

Prime sponsors which contract with other agencies to provide services usually develop a request for proposal (RFP) or application package to be used by agencies applying for funds. Although each prime sponsor's RFP differs in format and complexity, certain similarities exist. This section will briefly discuss the different sections of an RFP to give readers an introduction to CETA's requirements. To see how other agencies have used CETA funds to serve handicapped persons, refer to Appendix B.

Program Narrative

The heart of the proposal, the program narrative describes exactly what the applicant intends to accomplish with the requested funds and how the program will operate. Prime sponsors usually also ask applicants for some background information about the agency which will provide the service.

In the program description, an applicant should describe exactly which CETA services are to be provided, the method(s) used to provide these services, and the participant flow through the program. Significant segments to be served, as defined by age, sex, race, and national origin, must be ennumerated. In addition, recruitment techniques, client evaluation methods, and placement efforts must be described. Agencies requesting PSE or work experience funds must include job descriptions for these positions.

Background information about the applying agency includes a description of the organization and its administrative and financial structure. Because of CETA's heavy emphasis on proper use of funds, a sound financial system is usually necessary to successfully operate a CETA contract. Prime sponsors are also interested in the applicant's previous experience with employment and training programs.

One section of the narrative which is becoming more important is called 'program linkages'. Because of a concern about overlap and duplication of existing services, CETA officials want to know how the proposed program will fit into the current service delivery system. Linkages both with other CETA programs and non-CETA services are important. Examples of linkages include referrals to and from other agencies, a participant flow system which moves CETA participants from one CETA program (e.g., work experience or skill training) to a more advanced phase (e.g., PSE or OJT),

two agencies concurrently providing services to the same client (e.g., remedial education by one agency and work experience by another), or one agency providing administrative or training support for another agency's program. *An agency with strong linkages enhances its chances for contract approval.*

Budget

In preparing the proposal's budget, an agency will first need to determine the total expenses which are applicable to CETA programs under each title. These expenses will then need to be divided into the following cost categories: administrative costs, training costs, services costs, participant wages, participant fringe benefits, and participant allowances.

Administrative costs are limited to those costs necessary to run the CETA portion of an agency's operation and are composed of both direct and indirect costs. Costs attributed to both the general management and support functions of an organization and the administration of particular CETA program are included in this category. Examples of administrative costs include salaries and fringe benefits of executive, fiscal, legal, maintenance and procurement personnel, direct program administrators, and clerical staff performing support functions for the above-mentioned positions. Materials, supplies, equipment, space, utilities and travel associated with these positions are also considered administrative costs. The CETA regulations limit administrative expenses under each title, as explained in Table 5.

Services costs are those expenses attributable to the provision of employment and training services or supportive services. These include instructors' and counselors' salaries and fringe benefits plus the costs of space, utilities, equipment, and travel which are closely tied to the services provided to participants. Transportation, child care, health care, and other services which directly benefit participants are also a part of services costs.

Training costs consist of the goods and services which directly and immediately affect participants enrolled in a work program or a classroom training program. In addition to salaries and fringe benefits for personnel engaged in training activities, training costs include equipment, supplies, books, and other teaching aids, classroom space and utility costs and the portion of tuition fees that provides a direct benefit to participants in a training setting.

Participant wages and fringe benefits include wage payments to participants in transitional, subsidized work, and work experience, plus the fringe benefits associated with these wages. Table 6 summarizes wages and fringe benefits allowed under most conditions.

Table 5

Administrative Cost Limitations

	TITLE					
	II-A,B,C	II-D	IV**	VI	VII	Governor's Grants
Maximum Allowable Administrative Costs	20%	10%	20%	15%	20% for start up and implementation; To be reduced to 10%	Vocational Educational Assistance - 20%; Others - no restrictions

*Costs listed in this table are maximum administration funds allowed in regulations. Prime sponsors may retain up to 50% of these funds for prime sponsor's administrative costs.

**Except YCCIP

Table 6

Allowable Payments To Participants

	PSE	OJT	WE	Other Participants
Wages	Yes	Partial	Yes	Depends on prime sponsor
Allowances	No	No	No	Classroom training; Services when coupled with another activity
Workman's Compensation	Yes	Yes	Yes	No
Health Insurance	Yes	Yes	Yes	No
Collective Bargaining Coverages	Yes	Yes	No	No
Unemployment Insurance	Yes	Yes	No	No
Retirement	Optional*	No	Optional*	No

The above chart indicates general rules. In all cases, benefits should be equivalent to those of non-CETA employees.

*CETA participants may be excluded. If included, contributions must bear 'a reasonable relationship to the cost of providing benefits to that participant', or participants must be enrolled in a CETA program and retirement plan by June 30, 1979. (See S676.28-2 for full explanation.)

Participant allowances may be paid to persons enrolled in classroom training programs or receiving services which are part of another program. Although the regulations require that allowances equal the minimum wage, some Virginia prime sponsors have received special permission to pay less than the minimum wage so as to provide financial incentives for employment.

Program Planning Summary

This section of the proposal package summarizes the results expected from the program. Although most programs emphasize job placement as the desired outcome, some CETA programs accomplish other goals which are necessary before job placement can occur. One example of such a program would be GED preparation. The goal would be the awarding of a GED, which in turn would enable the participant to apply for a larger number of jobs for which he was previously ineligible.

In the summary, contractors are asked to indicate the number of participants to be enrolled and terminated in each calendar quarter. Of the terminations, the number of job placements, and other positive and non-positive terminations must be predicted. This information will be used during the contract year to judge whether or not a program is meeting its stated objectives.

Another function of the program summary is to assist prime sponsors in assessing the reasonableness of the proposal. Based on the type and number of clients served, the predicted outcomes, and the overall program costs, the prime sponsor can judge the cost effectiveness of the proposal.

Assurances And Certifications, General And Special Provisions

Each prime sponsor includes in the proposal package a list of printed assurances and provisions with which the proposing agency must comply. These assurances are included in order to notify potential contractors of their obligations under the regulations and to insure the prime sponsor against liability for a contractor's failure to comply with the regulations.

While it is beyond the scope of this publication to list all the assurances and provisions required by a prime sponsor, a few examples will be provided. *Agencies interested in contracting with CETA should get copies of the assurances and provisions and review them thoroughly.*

The assurances and certifications include compliance with the Civil Rights Act of 1964 and the Hatch Act, certification of an

organization's legal status, and adherence to the special federal regulations governing CETA programs. One example of such a regulation requires that PSE jobs not replace regular positions held by an agency.

The general provisions outline the procedures to be used by the prime sponsor to assure that the contract funds are properly spent. Included are the methods used to modify or terminate a contract, insurance and bonding requirements, monitoring procedures, and provisions for grievances by participants.

As with the entire proposal package, the assurances and general and special provisions should not be taken lightly. All of this data is incorporated into the final contract and will be monitored and audited after the contract period has ended.

ADMINISTERING A CETA CONTRACT

Much of the information needed to administer a CETA contract has already been mentioned in this guide or will be provided by the prime sponsor in the RFP. This section will cover topics not previously mentioned and offer some practical ways to avoid common administrative pitfalls.

One of the biggest difficulties most new contractors encounter is the integration of CETA funds into the existing bookkeeping system. CETA officials prefer that agencies operate an accrual accounting system and keep CETA funds separate from other agency funds. A number of agencies have found that a separate checking account and a separate set of books are the best means of accounting for CETA funds.

Many rehabilitation agencies operate on a fee-per-unit-of-service payment system and use the fee package developed by Title XX. Although prime sponsors prefer to contract with agencies via a fixed-cost grant, they will usually accept an agency's fee if that fee can be divided among the proper CETA cost categories.

An agency applying for CETA funds should carefully weigh the benefits against the costs. CETA is a complex piece of legislation; the contract administrator must be capable and willing to devote the time needed to understand and comply with its provisions. Agencies which underestimate the administrative and clerical efforts required may later struggle to provide the data needed for monitors and auditors.

In addition to the federal regulations, each prime sponsor establishes and revises procedures for the administration of its CETA programs. A good contract administrator will keep abreast of these procedures and let the prime sponsor know which procedures place an undue burden on his program operation. When properly informed of a contractor's special needs, a prime sponsor will usually try to help.

Most CETA contracts require regular reporting of financial and programmatic information. Although a contractor may assign the reporting functions to different staff members, he should be sure that one person is responsible for the overall administration of the CETA program. That person should have the authority to monitor all reports prepared by the agency and should know where all reports are filed. If possible a centralized filing system should be used.

Someone other than the executive director of an organization should administer the CETA contract, unless the organization is primarily funded by CETA. CETA administration requires much attention to detail which should be inconsistent with the role of an executive director of a multi-funded agency.

If conditions governing the program's operation change during the contract year, modify the CETA contract to reflect these changes. Contract modifications are not difficult to prepare and protect an agency against possible failure to comply with the terms of the original contract.

The prime sponsor staff members can be valuable assets. They should be contacted for questions about the contract or special instructions needed to complete reports. Some words of caution: An agency requesting an exemption from a certain policy or procedure should be sure to get the reply in writing. Monitors and auditors will need to see this information when reviewing the contract.

Administration of a CETA contract requires well-designed and effective systems run by conscientious and competent staff. When these elements are present in an organization, CETA can greatly enhance an agency's capability to serve its clients.

APPENDIX A

VIRGINIA PRIME SPONSORS

In Virginia, ten prime sponsors administer CETA programs in their jurisdictions. Of the ten, nine are composed of eligible local governments, either combined into a consortium or acting independently. The remaining prime sponsor, Balance-of-State, serves those regions not included in the other prime sponsors' jurisdictions.

This appendix will outline basic information about each prime sponsor obtained from personal interviews, written surveys, and a review of the 1980 master and annual plan. Although the information is basic and sometimes sketchy, it should give the reader a basis of introduction to CETA operations in his community.

Alexandria Economic Opportunities Commission

The Alexandria prime sponsor, serving only CETA participants in the City of Alexandria, is a small one. Until recently, the prime sponsor operated most of its own programs. Current plans emphasize more contracting with community agencies, specifically for classroom training, Title IV programs, and Title VI projects.

Currently, no special programs exist for handicapped participants. Rather, handicapped persons are served in existing programs. The plan specifies several programs in which handicapped persons are targeted for services.

Arlington County Manpower Administration

Arlington County's planning cycle differs significantly from those of other prime sponsors. Advertising for proposals begins in March and proposals are due in May. After the proposals are selected (usually in July), the annual plan is prepared. Other prime sponsors usually approve a preliminary plan before accepting proposals.

Currently, all Title II-A, B, and C funds are used to provide classroom training. While the prime sponsor has contracted with several agencies serving the handicapped, all of these contracts have been for PSE positions. No programs currently exist which are exclusively designed for handicapped persons but they are served in existing programs.

Henrico-Hanover-Chesterfield Consortium

The organizational structure of the H-C-H Consortium is somewhat unusual because it both operates and subcontracts program activities. Consortium staff operate most II-B activities with VEC providing job placement services. Youth programs are primarily operated by the county school boards. All other activities are contracted to other agencies.

Handicapped persons are served in existing programs, if feasible. When necessary, special arrangements are made for handicapped participants through work sites. Some agencies serving the handicapped have contracted with the prime sponsor for PSE positions.

Northern Virginia Manpower Consortium

The Northern Virginia Consortium, which contracts with agencies for training and employment programs, usually provides services to participants through its own staff efforts. Exceptions are made if the client group being served has special counseling needs. In these cases, the prime sponsor contracts with specialized agencies to provide the needed services.

In this geographical region, handicapped persons have been identified as needing specialized training and supportive services. The consortium has just started contracting with community agencies to provide classroom and OJT training, as well as needed services, to the handicapped population.

Peninsula Office Of Manpower Programs

The Peninsula area has identified a need for more employment and training programs serving the handicapped. To accomplish this goal, the prime sponsor has increased efforts to serve handicapped persons in regular programs.

A PSE project has published a pamphlet which identifies barrier-free buildings in the Peninsula area.

Prince William County Manpower Programs

Currently, no programs exist which are designed specifically for handicapped persons. However, because of the new regulations, the prime sponsor staff plans to investigate the need for programs serving handicapped persons. Handicapped referrals have increased with the opening of the new intake office in Dumfries, which is accessible to the physically handicapped.

Richmond Area Manpower Planning System (RAMPS)

The Richmond prime sponsor area is the most geographically interesting. Besides the City of Richmond, it includes four rural counties located beyond the suburban counties surrounding Richmond.

Because the planning council felt that a special program was needed to serve certain handicapped groups, the Richmond Department of Welfare began operating the Severely Handicapped Employability Demonstration Project (SHED) through a governor's grant.

Roanoke Consortium For Manpower Services

The Roanoke Consortium includes all of Planning District 5 except the City of Salem. The prime sponsor contracts with existing agencies for training plus services and employment programs need for participants.

No programs currently in operation are designed exclusively for the handicapped. However, handicapped persons are identified as a significant group of persons to be served in many programs.

Southeastern Tidewater Area Manpower Authority (STAMA)

STAMA, composed of eight jurisdictions in southeastern Virginia, is the largest local prime sponsor area. Although the prime sponsor contracts with community agencies to operate its program, no special program needs have been identified for the handicapped. Handicapped persons are either enrolled in existing programs or referred to the Department of Rehabilitative Services for services.

Balance Of State

The Balance-of-State (BOS) prime sponsor differs from the other prime sponsor areas because of its size, its organizational structure, and its generally non-urban emphasis. Composed of those jurisdictions not included in another prime sponsor region, the BOS serves approximately half of the CETA participants in Virginia. Administration is provided by the Richmond office and five regional operations centers. Local contractors usually work with CETA staff in one ROC office while statewide contractors report directly to the Richmond office.

In the BOS region, handicapped persons are served both in regular programs and in programs specifically designed for the handicapped. A number of sheltered workshops contract with BOS to provide employment and training services, while others offer work experience and skill training programs.

Table 7

Information About Individual Virginia Prime Sponsors

Name and Address of Prime Sponsor	Geographical Jurisdiction	Administrator/ Staff Contact for Technical Assistance	Method of Operation	Funding Body	Planning Body	Representative of Handicapped
Alexandria Economic Opportunities Council 815 King St. Alexandria, VA 22314 703/750-5731	City of Alexandria	Howard Bullen, III CETA Director Judith Earle Planner	Contracts with other agencies for Title IV, Title VI projects and classroom training	City Manager	Comprehensive Employment and Training Advisory Council	Sharon Whitmer-Fisher Dept. of Rehabilitative Services 901 N. Washington Street Alexandria, VA
Arlington County Manpower Administration 2100 14th St., N. Arlington, VA 22201 703/558-2688	Arlington County	Gerald Gordon, Manpower Administrator Rebecca Horahan - T. IV Beth Turbine-T.VI B. Rothenburg-T.II	Contracts with other agencies	Arlington County Board	Manpower Planning Council	William McCahill 2100 - 14th St., N. Arlington, VA 22201
Henrico-Chesterfield-Hanover Con. Manpower Admin. Byrd Ctr. Office Complex, 5651 S. Laburnum Ave. Richmond, VA 23231 804/226-1941	Henrico, Chesterfield, and Hanover Counties	Walter Coleman, CETA Administrator Wellford Dowdy, Supervisor, PSE	Operates own II-B programs; Contracts with other agencies for other Titles	Policy Committee, composed of political representatives from each jurisdiction	Planning Council	Paul Alexander, Department of Rehabilitative Services
Northern Va. Manpower Consortium Suite 301, Law Bldg., Co. of Fairfax, 4057 Chainbridge Road, Fairfax, VA 22030 703/691-3221	Counties of Fairfax and Loudon; Cities of Fairfax and Falls Church	Michael Gilbert, Manpower Director Suzanne Manzo, Contracts Officer	Contracts with other agencies	LAMPC/Loudon County Board of Supervisors; FMPC/Fairfax Board of Supervisors	Loudon Area Manpower Planning Council; Fairfax Manpower Planning Council	Shirley Jones No. Va. Community College, Loudon Co. Campus Ronald Drack 6028 Florence Lane Alex., VA 22310

Name and Address of Prime Sponsor	Geographical Jurisdiction	Administrator/ Staff Contact for Technical Assistance	Method of Operation	Funding Body	Planning Body	Representative of Handicapped
Peninsula Office of Manpower Prog. 2017 Cunningham Dr., Suite 300 P. O. Box 7489 Hampton, VA 23666 804/838-5206	York and James City Counties; Cities of Hampton, Newport News, Williamsburg, & Poquoson	Paul Clancey, Jr., Director Jim Croswhite, Chief Planner	Contracts with other agencies	Manpower Executive Board composed of city managers and county administrators	Peninsula Employment and Training Council	Bill Auer Handicapped, V 413 W. Mercury Blvd Hampton, VA 23666
Prince William Co. Office of Manpower 9300 Lee Avenue Old Bennett School Room 16 Manassas, VA 22110 703/368-9171, ext. 208	Prince William County; Cities of Manassas, Manassas Park	John Kirby, Manpower Director	Operates own programs	Prince William County Planning Council/Board of Supervisors	Prince William County Planning Council	None
Richmond Area Manpower Planning System 1113 W. Moore St. Richmond, VA 23220	City of Richmond; Charles City, New Kent, Goochland, & Powhatan Counties	Ralph Leach, Manpower Administrator Operations Mgr., PSE	Contracts with other agencies	Technical Advisory Council/RAMPS Policy Board	Technical Advisory Council	Zipporah Medford Mayor's Committee on Handicapped 321 Montrose Ave. Richmond, VA 23222
Roanoke Consortium for Manpower Svcs. Suite 301, Crystal Tower Bldg. 145 W.Campbell Ave Roanoke, VA 24014 703/982-2791	Cities of Roanoke, Clifton Forge, Covington; Alleghany, Botetourt, Craig and Roanoke Counties	Sharon Waddell, Administrator Contracts Officer Representative	Contracts with other agencies	Policy Board, composed of political representatives	Manpower Planning Council	Lattie Fisher Mental Health Svc. 303 Wash. Ave., SW Roanoke, VA 24016 Bryan Miller, Dept. of Rehab. Svcs. 402 Luck Ave., S.W. Roanoke, VA 24016

Name and Address of Prime Sponsor	Geographical Jurisdiction	Administrator/ Staff Contact for Technical Assistance	Method of Operation	Funding Body	Planning Body	Representative of Handicapped
Southeastern Tidewater Manpower Authority, Janaf Executive Bldg., Suite 300, POB 12072 Norfolk, VA 23502 804/461-3845	Cities of Norfolk, Portsmouth, Va. Beach, Chesapeake, Franklin, Suffolk; Isle of Wight & Southampton	Marcellus Heath, III, Executive Director Planner/Desk Officer in each jurisdiction	Contracts with other agencies	Policy Council composed of political representatives	Planning Council for each jurisdiction	William Pat White Norfolk Commission for the Handicapped 1712 Glendon Ave. Norfolk, VA 23518
Balance of State Va. Employment Commission, CETA Operations, Richmond Plaza Bldg. 111 S. 6th St. Richmond, VA 23211 804/786-1540	Jurisdictions not listed above	James R. Hawks, Director	Contracts with other agencies	Balance of State Staff	Governor's Manpower Planning Council	Altamont Dickerson Dept. of Rehab.Svc. 4901 Fitzhugh Ave. Richmond, VA 23226 804/257-0316
	REGIONAL OPERATIONAL CENTERS					
1. Abington ROC-Region I 310 W. Valley St. P.O. Box 267 Abington, VA 24210 703/628-8196	Planning Districts 1, 2 and 3	Gerald Griswold, Director Wayne Wolfe, Planner			Area Manpower Planning Council #1	Bonnie Reichter P. O. Box 7 Hiltons, VA 24258 703/386-7121

Name and Address of Prime Sponsor	Geographical Jurisdiction	Administrator/ Staff Contact for Technical Assistance	Method of Operation	Funding Body	Planning Body	Representative of Handicapped
					Area Manpower Planning Council #?	Earl S. Hess, Sr. P. O. Box 577 Raven, VA 24639 703/964-2000
					AMPC #3	John Holloway VCVH 111 Commonwealth Avenue Bristol, VA 24201
2. Roanoke ROC-Region II 403 W. Campbell Ave., SW Roanoke, VA 24016 703/982-7985	Planning Districts 4, 11, 12 plus city of Salem	Mel Fiel, Director Robert McKinney, Frank Barretta, Planners			AMPC #4 plus city of Salem	Mary Ann McPhail MH&MR 210 Third Street Radford, VA 24141
					AMPC #11	M. T. Payne Bedford Public Sch. 503 Longwood Avenue Bedford, VA 24523 703/586-0291

Name and Address of Prime Sponsor	Geographical Jurisdiction	Administrator/ Staff Contact for Technical Assistance	Method of Operation	Funding Body	Planning Body	Representative of Handicapped
					AMPC #12	James Fulk DRS 1045 Main Street Danville, VA 24541 804/793-1873
3. Farmville ROC-Region III Drawer R 2102 W. Third St. Farmville, VA 23901 804/392-8196	Planning Districts 13, 14, 19	Sumner Pugh, Director Betty Lou Weaver, Planner			AMPC #13	Michael Dance 905 Charles St. South Boston, VA 24592 804/476-2141
					AMPC #14	Naomi Cassada DRS 408-C E. 3rd Street Farmville, VA 23901 804/392-8189
					AMPC #19	Betty Burris Adult Activity Svcs. 412 Ingleside Ave. Emporia, VA 23847 804/634-3900

Name and Address of Prime Sponsor	Geographical Jurisdiction	Administrator/ Staff Contact for Technical Assistance	Method of Operation	Funding Body	Planning Body	Representative of Handicapped
4. Harrisonburg ROC - Region IV 1776 S. Main St. P. O. Box 869 Harrisonburg, VA 22801 703/433-1495	Planning Districts 6,7, 9, 10	Ben Vorhies, Director Alan Bohache, Jim Lincoln, Planners			AMPC #6	George Homan Friendship Indus. Rt. 1, Box A Weyers Cave, VA 24488
						Debbie Walker Valley Workshops P. O. Box 1204 Waynesboro, VA 22980 703/942-1771
					AMPC #7	David Schwemer Northwestern MH/MR P. O. Box 632 Winchester, VA 22601 703/667-2488
						Cheryl L. Robertshaw 118 Jamestown Rd. Front Royal, VA 22630 703/635-3502
					AMPC #9	Audrey Pullen F.O.R.E. P. O. Box 528 Remington, VA 22734 703/439-3505

Name and Address of Prime Sponsor	Geographical Jurisdiction	Administrator/ Staff Contact for Technical Assistance	Method of Operation	Funding Body	Planning Body	Representative of Handicapped
					AMPC #10	Ron Enders Workshop V 604 Henry Ave. Charlottesville, VA 22901
5. Warsaw ROC-Region V Rappahannock Community College North Campus P. O. Box 896 Warsaw, VA 22572 804/333-4048	Planning Districts 16, 17, 18, and 22	Herman Robins, Director Bill Chappel, Planner			AMPC #16	Greg McCracken Rappahannock Rehab. Facility 2204 Airport Rd. Fredericksburg, VA 22401 703/371-3070
					AMPC #17	Robert Kingsbury Northern Neck Workshop P. O. Box 726 Montross, VA 22520 804/493-9441
					AMPC #18	C. H. Robinson Handicap Unltd. Rt. 1, Box 105A Gloucester, VA 23601 804/693-4186

Name and Address of Prime Sponsor	Geographical Jurisdiction	Administrator/ Staff Contact for Technical Assistance	Method of Operation	Funding Body	Planning Body	Representative of Handicapped
					AMPC #18 (continued)	Martha Stebbins P. O. Box 1147 Gloucester, VA 23061 804/758-5975
					AMPC #22	Francis James Nasawadox, VA 23413 804/678-7779

APPENDIX B

CETA PROGRAMS SERVING HANDICAPPED PERSONS

A wide variety of programs serving the handicapped have used CETA funds to accomplish their goals. This appendix will publish abstracts of a few such projects located throughout the United States. In planning future client services, the reader may wish to contact the listed projects for more detailed information.

Project Title: Florida Association of Rehabilitation Facilities

Name and Address of Agency:
Florida Association of Rehabilitation Facilities
325 John Road, Suite L-500
Tallahassee, Florida 32203
(904)386-6111

Project Manager: Ms. Sheryl Ranson

Project Duration: October 1, 1979 - September 20, 1980

Target Population Served: Unemployed and Underemployed Emphasizing the Handicapped

Project Description:

Project will establish a job placement coordinating council composed of representatives from all programs providing job development/placement services for unemployed and underemployed persons in two districts in Florida.

A Job Placement Coordinator will be hired in each of the two test sites for the purpose of developing a model procedure for accomplishing the coordination of all job placement service programs and for implementing this model.

Project Title: C.O.O.R. Special Services Employment Project

Name and Address of Agency: C.O.O.R. Intermediate School District
11051 W. Cut Road, Pioneer Hills
Roscommon, Michigan 48653

Project Manager: George Johnson

Project Description:

C.O.O.R. is designed to provide education and training services to 35 Educably Mentally Impaired rural youth. Unique to this program model is the extent of private sector involvement. The local Holiday Inn has been directly involved with C.O.O.R. Intermediate School in each step of the planning and training process. At the completion of this one-year demonstration project, 30 students will be placed in unsubsidized employment in the restaurant/motel industry.

Project Title: Handicapper Job Club

Name and Address of Agency: Lansing Tri-County Regional Manpower Consortium
1850 W. Mt. Hope Avenue
Lansing, Michigan 48910

Project Manager: Mike Dennis

Project Description:

This project utilizes the 'job club' placement concept. The club is being operated by the Capitol Area Community Services and provides job seeking skills and job search assistance to 27 physically and/or mentally handicapped youth. The goal of this one year demonstration project is to place 18 participants in unsubsidized employment.

Project Title: Training Alternatives for Learning and Living (TALL, Inc.)

Name and Address of Agency: Training Alternatives for Learning and Living (TALL, Inc.)
3103 Swope Parkway
Kansas City, Missouri 64130

Project Manager: Mr. Ron Torner

CETA Funding Source: Special Governor's Grant

Project Description:

TALL, Inc. has designed and developed some adaptors to assist palsied and other handicapped with poor motor control to operate different kinds of office machines. They also train in job related and life coping skills.

Project Title: The Rehabilitation Institute (TRI)

Name and Address of Agency: The Rehabilitation Institute
223 Jericho Turnpike
Mineola, L.I., New York 11501

Project Manager: Mrs. Louise Friedman
Associate Director

Project Duration: Twelve months

Target Population Served: Emotionally or physically handicapped who are CETA eligible.

Project Outcomes: At the end of the six month period of training supervision the client will have permanent status as an employee of the company. It is conceivable that more than forty-eight clients would achieve permanent success since not every client required the total six months of project supervision.

Project Description:

This project is designed to overcome the difficulties emotionally handicapped persons may have in adjusting to competitive employment.

TRI proposes to place in business and industry groups of six on-the-job trainees accompanied by a project training supervisor who will be responsible for their continued training, productivity, and vocational adjustment during the first six months of employment. A total of at least forty-eight trainees would be placed during the first year at Long Island companies with whom TRI has successfully worked and placed clients in the past. The project coordinator has developed close and on-going liaison between each of these companies and the project. Appropriate company personnel such as the personnel director, medical consultant, foreman and potential co-workers would be involved through individual meetings, conferences and on-site visits. The project coordinator would obtain advanced knowledge of job skill requirements and job expectations and will be responsible for the overall coordination and flow of the projects trainees and the respective company jobs. The daily work and social adjustment of the trainees would be overseen on the job site by the project training supervisor. Also, mental health counseling services would be provided to the client, the client's family and the employer by a clinical psychologist and psychiatric social worker to maximize vocational success.

Project Title: Vera Institute

Name and Address of Agency: Vera Institute of Justice
30 East 39th Street
New York, New York 10016

Project Manager: Ms. Emily Marks

Project Duration: 13 months

Target Population Served: Mentally handicapped persons with skill levels appropriate for supported work.

Project Outcomes: It is hoped that 60 people are transitioned to unsubsidized employment.

Project Description:

The objective of this program is to place retarded persons in work situations which would provide them with opportunities not available in sheltered work settings.

The Vera Institute would contract with private or public organizations to place mentally handicapped individuals in work experience and OJT positions. Vera Institute would also provide a supervisory staff whose responsibility would be to adequately prepare the participants for supported work before they arrive at the job site and then to train them in the requisite job skills. All supervision and training would be closely coordinated with worksite personnel who would provide necessary input and expertise.

The daily supervision by Vera Institute staff supervisors would provide the support that mentally handicapped persons need to prove their working potential. The employer would have an opportunity to 'try out' mentally handicapped individuals and become familiar with their capabilities. In addition, these individuals would learn marketable job skills and favorable work habits.

Project Title: Electronic Industries Foundation

Name and Address of Agency:
Electronic Industries Foundation
2001 Eye Street, NW, Suite 201
Washington, D.C. 20006
202/457-4913

Project Manager: Carol A. Dunlap

Project Description:

This project will find and refer 300 handicapped persons in Los Angeles, San Francisco, and Massachusetts to jobs in the electronics industry by centralizing job placement activities.

Participating companies submit job openings to the project office. These are distributed to statewide programs serving the handicapped, who solicit applications from qualified handicapped persons. Employers contact referring source for additional information, if necessary. The project office follows up all referrals.

Project Title: National Business School

Name and Address of Agency:
National Business School
3108 Mt. Vernon Avenue
Alexandria, VA 22305

Project Manager: Gary Smucker, Director
703/683-6554

CETA Funding Source:
Title II-B
Individual Referrals

Project Description:

This non-profit organization operates classroom training programs for emotionally handicapped persons. Courses of study include data entry, accounting, clerical, and GED preparation. The agency is reimbursed for its tuition by CETA.

Project Title:	Sheltered Workshop of Bedford	Sheltered Workshop of Altavista
Name and Address of Agency:	Sheltered Workshop of Bedford 414 Jackson Street Bedford, VA 24523	Sheltered Workshop of Altavista 521 Broad Street Altavista, VA 24517
Project Manager:	Renee Fisher Executive Director 703/586-1430	Bob Spencer Executive Director 804/369-6920
CETA Funding Source:	Title II-B Work Experience	

Project Description:

These agencies operate training programs for mentally retarded, emotionally and physically handicapped persons in the woodworking and clerical fields. Both agencies provide instruction in these fields, coupled with work experience and the needed services. Clients are placed in these occupations upon completion of the three to six month programs.

Project Title: Manpower Services Programs

Name and Address of Agency:

Workshop V., Inc.
604 Henry Ave.
Charlottesville, VA 22901
Ron Enders, Exec. Director
804/295-0147

SHEN-PACO Industries, Inc.
Route 1, Box 189
New Market, VA 22844
Tony Hill, Exec. Director
703/740-3179

Northwestern Workshop
329 N. Cameron Street
Winchester, VA 22601
Susan Dawkins, Exec. Director
703/667-0809

Friendship Industries
380 Waterman Drive
Harrisonburg, VA 22801
Dave Flick, Exec. Director
703/434-9586

Project Description:

Several sheltered workshops in Virginia have contracted with CETA under Title II-B to provide manpower services to their handicapped participants. In these programs, the CETA grant funds work adjustment and job placement services for participants. Although participants are placed on work sites in each facility, wages for these participants are not reimbursed by CETA.

Bibliography

A Guide to the Comprehensive Employment and Training Act for Rehabilitation Facilities and Other Contracting Agencies. Michigan Association of Rehabilitation Facilities, 938 Michigan National Tower, Lansing, Michigan. 48933, March 1978.

CETA: A Citizen's Action Guide. Center for Community Change, 1000 Wisconsin Avenue, NW, Washington, D.C., 20007, April 1979.

Comprehensive Employment and Training Act Regulations. Federal Register, Vol. 44, No. 65, Tuesday, April 3, 1979.

The Comprehensive Employment and Training Act Amendments of 1978. Public Law 95-524, 95th Congress, October 27, 1978.

CETA Master Plans and FY80 Annual Plans

Prime Sponsors:

Arlington County Manpower Administration
2100 - 14th St., North
Arlington, VA 22201

Alexandria Economic Opportunities Commission
815 King Street
Alexandria, VA 22314

Henrico-Chesterfield-Hanover Consortium
Manpower Administration
Byrd Center Office Complex
5651 S. Laburnum Avenue
Richmond, VA 23231

Northern Virginia Manpower Consortium
Suite 301, Law Building
County of Fairfax
4057 Chainbridge Road
Fairfax, VA 22030

Peninsula Office of Manpower Programs
2017 Cunningham Drive
Suite 300, P. O. Box 7489
Hampton, VA 23666

Richmond Area Manpower Planning System
1113 West Moore Street
Richmond, VA 23220

Roanoke Consortium for Manpower Services
Suite 301, Crystal Tower Building
145 West Campbell Avenue
Roanoke, VA 24014

Southeastern Tidewater Manpower Authority
Janaf Executive Building, Suite 300
P. O. Box 12072
Norfolk, VA 23502

Bibliography (continued)

Balance of State
Virginia Employment Commission
CETA Operations
Richmond Plaza Building
111 South 6th Street
Richmond, VA 23211